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June 27, 2024

## **VIA ECF**

Hon. Edgardo Ramos Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 MEMO ENDORSED

at 2.

Re: *T.R. v. N.Y.C. Dep't of Education*, 22-cv-6373 (ER)(GS)

Dear Judge Ramos:

I am a Special Assistant Corporation Counsel in the Office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks *inter alia* attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. § 1400, *et seq.*, as well as for this action.

The parties write jointly to respectfully request that the July 3, 2024 conference be adjourned 4 weeks to July 31, 2024, or a time thereafter more convenient for the Court. This is the eighth request to adjourn the conference. The first request was made on June 1, 2023 and granted by Your Honor the following day. The second request was made on August 1, 2023 and granted by Your Honor on August 3, 2023. The third request was made on October 6, 2023 and granted by Your Honor that day. The fourth request was made on November 28, 2023 and granted by Your Honor on November 30, 2023. The fifth request was made on February 9, 2024 and granted by Your Honor that day. The sixth request was made on March 11, 2024 and granted by Your Honor on March 13, 2024. The seventh request was made on May 28, 2024 and granted by Your Honor that same day.

The requested adjournment will permit the parties to continue working to settle the matter while also resolving all remaining service provider payments. Since the parties' last adjournment request, the parties have been working diligently to reconcile the remaining provider invoices and payments made on behalf of the Student. The parties are hopeful that they can settle this matter without further burden on the Court's time.

Accordingly, the parties respectfully request that the July 3, 2024 conference be adjourned to July 31, 2024. Thank you for considering this request.

Respectfully submitted,

/s/

Martha Nimmer, Esq. Special Assistant Corporation Counsel

cc: Benjamin Kopp, Esq. (via ECF)

Defendant's request for an adjournment of the July 3, 2024 conference is granted. The conference is rescheduled to August 2, 2024, at 11:30 AM. SO ORDERED

Edgardo Ramos, U.S.D.J.

Dated: <u>06/28/2024</u> New York, New York